

1 Chaim Z. Appel, Esq. (*Admitted pro hac vice*)
New York State Bar No. 4849444
2 APPEL LAW FIRM PLLC
4533-16 Avenue
3 Brooklyn, New York 11204
Telephone: (212) 252-2045
4 Facsimile: (718) 972-3371
cappel@CustomsAndLaw.com

5 John K. Gallagher, Esq.
6 Nevada State Bar No. 956
GUILD, GALLAGHER & FULLER, LTD.
7 100 West Liberty Street, Suite 800
Reno, Nevada 89501
8 Telephone: (775) 786-2366
Facsimile: (775) 322-9105
9 *jgallagher@ggfltd.com*

10 *Attorneys for Plaintiffs*

11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 JOSEPH WEINFELD, LIANA KNIJNIKOVA,)
ISAAC WEISS, ROBERT FRANK,)
14 YEHUDAH NUSSBAUM, MOSES)
STEINMETZ, ALBERT ISAAC, JOSEF)
15 KOHN, MICHAEL FRIEDMAN and)
CONGREGATION BETH JOSEPH,)
16 Derivatively on behalf of PRECIOUS)
MINERALS MINING AND REFINING)
17 CORP.,)

18 Plaintiffs,)

19 v.)

20 BILL L. MINOR, JOHN H. REYNOLDS, and)
WALTER A. MARTING, JR.,)

21 Defendants,)

22 and)

23 PRECIOUS MINERALS MINING AND)
24 REFINING CORP., a Nevada corporation,)

25 Nominal Defendant.)
26

Case No. 3:14-cv-00513-RCJ-WGC

**STIPULATION AND ORDER TO
EXTEND PLAINTIFFS' TIME TO FILE
AN OPPOSITION TO DEFENDANTS'
MOTION FOR FEES AND COSTS**

(First Request)

27 Plaintiffs JOSEPH WEINFELD, LIANA KNIJNIKOVA, ISAAC WEISS, ROBERT
28 FRANK, YEHUDAH NUSSBAUM, MOSES STEINMETZ, ALBERT ISAAC, JOSEF KOHN,

1 MICHAEL FRIEDMAN and CONGREGATION BETH JOSEPH, derivatively on behalf of
2 PRECIOUS MINERALS MINING AND REFINING CORP. (hereinafter "Plaintiffs"), and
3 Defendants BILL L. MINOR, JOHN H. REYNOLDS, and WALTER A. MARTING, JR.
4 (hereinafter "Defendants"), pursuant to LR IA 6-1, LR IA 6-2 and LR II 7-1, hereby stipulate and
5 agree as follows:

6 **WHEREAS**, on March 27, 2018, this Court entered its Order and Judgment in this case for
7 Defendants, [ECF No. 157-8], and on April 10, 2018, Defendants filed Defendants' Motion for
8 Attorneys' Fees and Costs (hereinafter "Motion"), [ECF No. 160];

9 Given that Defendants' Motion is directed at each of the remaining eight (8) individual
10 Plaintiffs, with whom their counsel needs to meet individually to review and respond to the
11 Defendants' Motion, and the current deadline for Plaintiffs to file an opposition to Defendants'
12 Motion is Tuesday, April 24, 2018;

13 This is the first stipulation for extension of time to file an opposition to a motion;

14 This stipulation is made by the parties in good faith and not for any improper purpose;

15 // // //

16 // // //

17 // // //

18 // // //

19 // // //

20 // // //

21 // // //

22 // // //

23 // // //

24 // // //

25 // // //

26 // // //

27 // // //

28 // // //

1 ***NOW, THEREFORE***, and good cause appearing, it is hereby stipulated and agreed as
2 follows:

3 1. The current deadline to oppose Defendants' Motion shall be extended for a period
4 of thirty (30) days, such that the deadline for Plaintiffs to file their opposition to Defendants'
5 Motion shall be extended to expire on Tuesday, May 22, 2018.

6 DATED the 19th day of April, 2018.

7 LAW OFFICES OF MICHAEL J.
8 MORRISON

APPEL LAW FIRM PLLC

9 By: /s/ Michael J. Morrison
10 Michael J. Morrison, Esq.
11 Nevada State Bar No. 1665
12 1495 Ridgeview Drive, Suite 220
13 Reno, NV 89519
14 Tel. (775) 827-6300
15 *venturelawusa@gmail.com*

By: /s/ Chaim Z. Appel
Chaim Z. Appel, Esq. (*pro hac vice*)
4533-16 Avenue
Brooklyn, New York 11204
(212) 252-2045 (phone)
(718) 872-3371 (fax)
cappel@customsandlaw.com

Counsel for Defendants

Counsel for Plaintiffs

16 IT IS SO ORDERED:

17 
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: April 24, 2018